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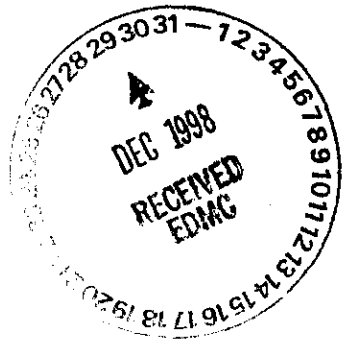
November 28, 1998



Mr. Dennis Faulk
U.S. Environmental Protection Agency
712 Swift Blvd., Suite 5
Richland, WA 99352

Dear Mr. Faulk:

Please include the following in the record of public comments on the "Proposed Plan for Clean Up at the 100 Area Remaining Sites". If you have any questions, please contact me at my home telephone (509)-946-4409.

49915
49914

I have reviewed DOE/RL-97-83, DOE/RL-94-61 Appendix N, and the Fact Sheet on this subject. I fully support the DOE-proposed alternatives: 1) use the clean up alternative of remove/treat/dispose at the 46 waste sites listed in Tables A-1 & NA-1, 2) use the 'plug-in approach' at the remaining 161 sites listed in Tables A-2 & NA-2, and 3) dispose of excess equipment and debris from the 100 Area reactor buildings at the Environmental Restoration Disposal Facility (ERDF).

The proposed alternatives are essentially the same as remove/treat/dispose actions that have been previously assessed and are currently being used very successfully at the Operational Units 100-BC-1, 100-BC-2, 100-DR-1, and are starting to be applied at 100-DR-2 and 100-FR-1.

Note that reference PNL-6456 Vol. 2, "Hazard Ranking System Evaluation of CERCLA Inactive Waste Sites at Hanford," October 1988 (one of the data sources for the WIDS database) shows accountable amounts of plutonium in three of the Table A-2 waste sites). French Drain 116-F-7 contains 0.00003 Ci Pu-239, and Cooling Water Ponds 216-N-4 and 216-N-6 each contain 1 gram of plutonium (0.0571 Ci Pu-239 each and 0.0154 or 0.132 Ci Pu-240, respectively). Hence, no waste site (i.e., sites designated 116-_-_, 118-_-_, 216-_-_, or 618-_-_ included in Table A-1 or A-2 of DOE/RL-97-83) contains enough plutonium to be a criticality safety hazard.

Sincerely,

L.C. Davenport

Leslie C. Davenport,
Senior Engineer, Nuclear Safety (Retired)

PNL-6456 Vol. 2
UC-70

9034

HAZARD RANKING SYSTEM EVALUATION OF CERCLA INACTIVE WASTE SITES AT HANFORD

Volume 2 - Engineered-Facility Sites (HISS Data Base)

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October 1988

Prepared for
the U.S. Department of Energy
under Contract DE-AC06-76RLO 1830

Pacific Northwest Laboratory
Richland, Washington 99352

SITE ID NO.: 116-F-7

ALIAS: 117-F Crib
STATUS: Inactive
DIMENSIONS:
Length: 0 ft
Width: 0 ft
Depth: 20 ft
Diameter: 4 ft

FACILITY: French Drain
ELEVATION: 404 ft
WATERTABLE: 27 ft
HRS Migration Score: 40.093

LOCATION: 100-F
COORDINATES: N78592/W31204 (Center of crib)

SITE DESCRIPTION:

A French drain approximately 4 ft. diameter x 20 ft. deep, filled with gravel, and covered with clean soil. The facility is marked by a vent pipe and four steel posts.

SERVICE DATES: 1960-1965

SERVICE HISTORY:

From 1960 to 1965 the site received drainage from confinement seal pits. The site was retired in 1965.

REFERENCES:
Documents: UNI-946
Photographs: 122440-383-CN
Drawings: H-3-57210

SITE ID NO.: 116-F-7

CHEMICALS DISPOSED

SODIUM DICHROMATE:	0.000 kg
SODIUM OXYLATE:	0 kg
SODIUM SULFAMATE:	0 kg
AMMONIUM:	0 kg
COPPER SULFATE:	0 kg
SODIUM HYDROXIDE:	0 kg
SULFURIC ACID:	0 kg
SULFAMIC ACID:	0 kg
POTASSIUM BORATE:	0 kg
TOTAL VOLUME DISPOSED:	300000 Liters

RADIONUCLIDE INVENTORY
(in curies)

H-3:	0.00000	CE-144:	0.00000
C-14:	0.00000	PR-144:	0.00000
MN-54:	0.00000	PM-147:	0.00000
CO-60:	0.00000	EU-152:	0.00005
NI-63:	0.00000	EU-154:	0.00000
KR-85:	0.00000	EU-155:	0.00000
SR-90:	0.00002	NP-237:	0.00000
Y-91:	0.00000	PU-238:	0.00000
NB-95:	0.00000	PU-239:	0.00003
ZR-95:	0.00000	PU-240:	0.00000
TC-99:	0.00000	PU-241:	0.00000
RU-103:	0.00000	AM-241:	0.00000
RU-106:	0.00000	U-233:	0.00000
SN-113:	0.00000	U-235:	0.00000
SB-125:	0.00000	U-238:	0.00000
I-129:	0.00000	TH-232:	0.00000
CS-134:	0.00000	BETA:	0.00000
CS-137:	0.00000	GAMMA:	0.00000
CE-141:	0.00000	ALPHA:	0.00000

These values are decayed through April 1, 1986.

SITE ID NO.: 216-N-4

ALIAS: 212-P Swamp, 216-N-2, 216-N-4 Swamp
STATUS: Inactive
DIMENSIONS:
Length: 500 ft
Width: 200 ft
Depth: 3 ft
Diameter: 0 ft

FACILITY: Pond
ELEVATION: 558 ft
WATERTABLE: 153 ft
HRS Migration Score: 45.303

LOCATION: 200 North
COORDINATES: Head: N53400/W62600, End: N54300/W62700

SITE DESCRIPTION:

Pond, with 500 ft. x 200 ft. wide bottom dimensions.

SERVICE DATES: 1944-1952

SERVICE HISTORY:

From 9/44 to 6/52 the site received the basin overflow waste from the 212-P Building. The site was retired in 6/52 when the 212-P building was shut down.

REFERENCES:
Documents: ARH-2806, RHO-CD-673, HW-55176
Photographs: 122440-27-CN
Drawings: H-3-57210

SITE ID NO.: 216-N-4

CHEMICALS DISPOSED

TOTAL VOLUME DISPOSED: 946000000 Liters

No chemicals discharged.

RADIONUCLIDE INVENTORY
(in curies)

H-3:	0.00000	CE-144:	0.00000
C-14:	0.00000	PR-144:	0.00000
MN-54:	0.00000	PM-147:	0.00000
CO-60:	0.00000	EU-152:	0.00000
NI-63:	0.00000	EU-154:	0.00000
KR-85:	0.00000	EU-155:	0.00000
SR-90:	0.07830	NP-237:	0.00000
Y-91:	0.00000	PU-238:	0.00000
NB-95:	0.00000	PU-239:	0.05710
ZR-95:	0.00000	PU-240:	0.01540
TC-99:	0.00000	PU-241:	0.00000
RU-103:	0.00000	AM-241:	0.00000
RU-106:	0.00000	U-233:	0.00000
SN-113:	0.00000	U-235:	0.00000
SB-125:	0.00000	U-238:	0.00152
I-129:	0.00000	TH-232:	0.00000
CS-134:	0.00000	BETA:	0.31400
CS-137:	0.08860	GAMMA:	0.00000
CE-141:	0.00000	ALPHA:	0.00000

These values are decayed through April 1, 1986.

SITE ID NO.: 216-N-6

ALIAS: 212-R Swamp, 216-N-6 Swamp
STATUS: Inactive
DIMENSIONS:
Length: 500 ft
Width: 150 ft
Depth: 3 ft
Diameter: 0 ft

FACILITY: Pond
ELEVATION: 557 ft
WATERTABLE: 152 ft
HRS Migration Score: 45.303

LOCATION: 200 North
COORDINATES: Head: N53600/W60030, End: N54350/W60115

SITE DESCRIPTION:

Pond, with 500 ft. long x 150 ft. wide bottom dimensions.

SERVICE DATES: 1944-1952

SERVICE HISTORY:

From 9/44 to 6/52 the site received the normal overflow from the 212-R Basin. The site was retired in 6/52 when 212-R was shut down.

REFERENCES:
Documents: ARH-2806, RHO-CD-673, HW-55176
Photographs: 122440-26-CN
Drawings: H-3-57210

SITE ID NO.: 216-N-6

CHEMICALS DISPOSED

TOTAL VOLUME DISPOSED: 946000000 Liters

No chemicals discharged.

RADIONUCLIDE INVENTORY
(in curies)

H-3:	0.00000	CE-144:	0.00000
C-14:	0.00000	PR-144:	0.00000
MN-54:	0.00000	PM-147:	0.00000
CO-60:	0.00000	EU-152:	0.00000
NI-63:	0.00000	EU-154:	0.00000
KR-85:	0.00000	EU-155:	0.00000
SR-90:	0.07830	NP-237:	0.00000
Y-91:	0.00000	PU-238:	0.00000
NB-95:	0.00000	PU-239:	0.05710
ZR-95:	0.00000	PU-240:	0.01320
TC-99:	0.00000	PU-241:	0.00000
RU-103:	0.00000	AM-241:	0.00000
RU-106:	0.00000	U-233:	0.00000
SN-113:	0.00000	U-235:	0.00000
SB-125:	0.00000	U-238:	0.00152
I-129:	0.00000	TH-232:	0.00000
CS-134:	0.00000	BETA:	0.32800
CS-137:	0.08860	GAMMA:	0.00000
CE-141:	0.00000	ALPHA:	0.00000

These values are decayed through April 1, 1986.